

**OFFICE OF THE CHAPTER 13 STANDING TRUSTEE**  
**Isabel C. Balboa, Esquire**  
**Cherry Tree Corporate Center**  
**535 Route 38, Suite 580**  
**Cherry Hill, NJ 08002**

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY  
(Camden)

**IN RE:**

**ROGER E. PARROTT**

**Debtor(s).**

Proceedings in Chapter 13

Case No. 11-40576 (JNP)

Hearing Date: April 19, 2017

Judge: Jerrold N. Poslusny, Jr.

**TRUSTEE'S OBJECTION TO CONFIRMATION OF**  
**DEBTOR'S MODIFIED CHAPTER 13 PLAN**

Isabel C. Balboa, Chapter 13 Standing Trustee, hereby objects to confirmation of Debtor's Modified Chapter 13 Plan.

1. On August 21, 2011, Debtor filed for Chapter 13 Bankruptcy protection.
2. Debtor's First Modified Chapter 13 Plan dated April 3, 2012, proposed \$1,118 for five (5) months; then \$2,000 for the remaining fifty-five (55) months to pay: administrative counsel fees; the Internal Revenue Service; Regional Sewer Service; Voorhees Township; cramdown in the amount of \$72,000 to Robert Gilbert; avoid the liens of Harry McCabe and William C. Fox; and a pro rata distribution to unsecured creditors.
3. On June 8, 2012, the Court confirmed the Modified Chapter 13 Plan dated April 3, 2012 as proposed.
4. Debtor's last plan payment under the confirmed plan was received on December 12, 2016.
5. On December 13, 2016 the Trustee closed the case as complete.
6. On March 17, 2017, Debtor filed a Modified Chapter 13 Plan to include a judgement lien held by Paul Davis Systems of South NJ.

The Modified Chapter 13 plan filed on March 17, 2017 was after the completion of plan payments in violation of 11 U.S.C. §1329(a).

Dated: 04/18/2017

/s/ Isabel C. Balboa

Isabel C. Balboa  
Chapter 13 Standing Trustee